

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) Criminal Action No. 06-008-SLR
RICHARD D. REID,)
Defendant.)

UNITED STATES' REQUEST FOR SPECIAL VOIR DIRE

NOW COMES the United States of America, by and through its undersigned attorneys, and hereby requests that, in addition to the Court's standard Criminal Voir Dire questions, the Court submit the following additional questions to the jury panel in the above-captioned case:

1. Would the fact that the New Castle County Police Department and the Bureau of Alcohol, Tobacco, Firearms and Explosives or "ATF" are the primary investigating agencies in this case interfere with your ability to be a fair and impartial juror?
2. Does any member of the panel have strong views about the possession of firearms, including whether such possession should be legal or illegal, that would interfere with your ability to be a fair and impartial juror in this case?
3. Among other charges, this case involves charges related to the possession and distribution of various narcotics, including cocaine base or "crack." Is there anything about the nature of these charges that would interfere with your ability to be a fair and impartial juror?

The undersigned has discussed this request with the Defendant's counsel, Eleni Kousoulis,

Esquire, who does not object to the request.

COLM F. CONNOLLY
United States Attorney

By: /s/

Sophie E. Bryan
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Dated: January 30, 2007

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CERTIFICATE OF SERVICE

I, Sophie E. Bryan, Assistant United States Attorney for the District of Delaware, hereby certify that on the 30th day of January, 2007, I caused to be electronically filed the foregoing **United States' Request for Special Voir Dire** with the Clerk of the Court using CM/ECF. Said document is available for viewing and downloading from CM/ECF and will be electronically transmitted to the following defense counsel of record:

Eleni Kousoulis, Esq.
Federal Public Defender's Office
704 King Street
Suite 110
Wilmington, DE 19801

/s/